

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UMG RECORDINGS, INC.; CAPITAL RECORDS, LLC; WARNER BROS. RECORDS INC.; ATLANTIC RECORDING CORPORATION; ELEKTRA ENTERTAINMENT GROUP, INC.; FUELED BY RAMEN, LLC; NONESUCH RECORDS INC.; SONY MUSIC ENTERTAINMENT; SONY MUSIC ENTERTAINMENT US LATIN LLC; ARISTA RECORDS LLC; LAFACE RECORDS LLC; and ZOMBA RECORDING LLC,

Plaintiffs,

v.

TOFIG KURBANOV d/b/a FLVTO.BIZ and 2CONV.COM;  
And DOES 1-10,

Defendants.

**Case No.  
1:18-CV-00957-CMH-TCB**

**DEFENDANT'S MOTION TO STAY DISCOVERY AND PROCEEDINGS PENDING:  
(1) THIS COURT'S FURTHER RULING ON PERSONAL JURISDICTION AS  
REQUIRED BY THE FOURTH CIRCUIT'S ORDER OF REMAND;  
AND (2) A RULING ON DEFENDANT'S (FORTHCOMING)  
PETITION FOR CERTIORARI TO THE UNITED STATES SUPREME COURT**

For the reasons set forth in the accompany Memorandum in Support, Defendant requests respectfully that the Court stay discovery and all other proceedings in this case until:

- (a) this Court has issued its decision concerning the reasonability analysis as required by the Fourth Circuit's order of remand, and
- (b) the United States Supreme Court has issued an order either denying Mr. Kurbanov's *certiorari* petition or (having allowed such a petition) issues

its order following its consideration of Mr. Kurbanov's appeal.

Respectfully submitted,

**TOFIG KURBANOV**

By Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of September, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

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**CERTIFICATE OF COMPLIANCE WITH MEET AND CONFER REQUIREMENTS**

I hereby certify that, prior to the filing of this motion, counsel met and conferred with Plaintiff's counsel in an attempt to narrow or eliminate the disputes addressed in this motion.

/s/ Jeffrey H. Geiger  
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